

REMARKS

Applicants respectfully request that the foregoing amendments be made prior to examination of the present application.

Claims 40, 45, 47, 50, 54, 55, 58, 59, 66, 68, 75, and 77 have been amended. Claims 40-77 are now pending in this application.

In the Office Action dated January 12, 2005, Claims 40-46, 49-54, and 57-58 were rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent 6,084,585 (Kraft). Claims 47, 55, 59-63, 65-72, and 74-77 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and further in view of U.S. Patent 6,507,854 (Dunsmoir). Claims 48 and 56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and further in view of U.S. Patent 6,212,552 (Billiris). Claims 64 and 73 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and Dunsmoir and further in view of Billiris. Applicants reserve the right to swear behind Kraft, Dunsmoir, and Billiris. Applicants respectfully traverse the rejections.

Claims 41-49 depend from Claim 40. Claim 40 recites:

designing a template using a page layout application;

Claims 51-57 depend from Claim 50. Claim 50 recites:

receive a changeable field designated by a user within a template wherein the changeable field comprises a name and a plurality of data items linked to the changeable field, and further wherein the template is designed using a page layout application;

Claim 58 recites:

receive a changeable field designated by a user within a template wherein the changeable field comprises a name and a plurality of data items linked to the changeable field, and further wherein the template is designed using a page layout application;

Claims 60-67 depend from Claim 59. Claim 59 recites:

designating a changeable field within a template, the template designed using a page layout application executing at a workstation;

...

editing the template using the page layout application, the page layout application executing at the server.

Claims 69-76 depend from Claim 68. Claim 68 recites:

receive a template and a plurality of data items linked to a changeable field designated within the template, the template designed using a page layout application executing at a workstation;

...

provide editing of the template using the page layout application, the page layout application executing at a server.

Claim 77 recites:

receive a changeable field designated by a user within a template, the template designed using a page layout application executing at the client computer;

...

provide editing of the template using the page layout application, the page layout application executing at the server computer;

Neither Kraft, Dunsmoir, nor Billiris describe, suggest, or teach use of a “page layout application.” A person of ordinary skill in the art would define “page layout” as “the process of placing and arranging and rearranging text and graphics on the page to produce documents such as newsletters, brochures, books, etc. The primary software programs for desktop publishing are called page layout applications.” Desktop Publishing – Page Layout, printed April 11, 2005, at <http://desktoppub.about.com/cs/basic/g/pagelayout.htm>. A copy of this article is included with this Preliminary Amendment as Exhibit A. A person of ordinary skill in the art would state that the “primary purpose of page layout software is to make it easy to combine text and graphics to create layouts for brochures, ads, newsletter, greeting cards, books, and similar publications.”

Desktop Publishing – Page Layout Software, printed April 11, 2005, at
<http://desktoppub.about.com/cs/basic/g/swpagelayout.htm>. A copy of this article is included with this Preliminary Amendment as Exhibit B.

Kraft describes “a graphical user interface (GUI) to assist a user in completing electronic forms.” (Abstract). The GUI at “step 204 presents an initial screen to the user, including a ‘row entry template.’ A row entry template comprises two or more associated information fields that may be completed by a user entering data into the information fields.” (Col. 4, lines 39-43). Kraft further describes “[u]sing input obtained with the GUI, the terminal 120 **may ‘submit’ the data** by storing it locally and/or transmitting the data back to the host 102.” (Col. 4, lines 4-6, Emphasis added). Thus, Kraft further describes “[i]f all verification steps are completed and the completed form is in appropriate condition for submission, **the form is then submitted to the program intended to receive the form**. For instance, in the expense report example, the intended program may be an accounting program for reimbursement of travel expenses.” (Col. 10, lines 44-49, Emphasis added). Therefore, the row entry template is a row in a form presented in a GUI that gathers data for insertion in another program. Kraft does not disclose the intended program that receives the data from the form at all. As a result, Kraft fails to describe, suggest, or teach use of a “page layout application.”

Dunsmoir describes “an enhanced caching and mirroring router which modifies stored web pages in order to indicate the age, time of capture.” (Abstract). In describing the router, Dunsmoir states “the caching engine (11) uses the Boson servlet (23) to merge a marking template (25) with the cached page copy (24). Table 1 shows an example of a HTML template which could be used as the marking template.” (Col. 4, lines 29-33). Dunsmoir further describes “Boson is passed this template ..., and it is passed the parameter string (25) Then, it merges the two to create a new HTML output (26) as shown in Table 3.” (Col. 4, lines 67-71). An HTML output is not designed using a page layout application. Therefore, Dunsmoir fails to describe, suggest, or teach use of a “page layout application.”

Billiris describes “a messaging system ..., which supports combinations of directory and mailing list addressing mechanisms.” (Abstract). Billiris fails to describe, suggest, or teach use of a “page layout application.”

For at least the foregoing reasons, neither Kraft, Dunsmoir, nor Billiris describe, suggest, or teach the limitation of use of a “page layout application.” As a result, Kraft, Dunsmoir, and Billiris fail to disclose, suggest, or teach all of the limitations of claims 40, 50, 58, 59, 68, and 77. Claims 41-49, 51-57, 60-68, and 69-76 are allowable for at least the reasons outlined above relative to claims 40, 50, 58, 59, 68, and 77. As a result, Applicants believe that this application is in condition for allowance.

Respectfully submitted,

Dated: April 11, 2005

By Callie M. Bell

FOLEY & LARDNER LLP
150 East Gilman Street
Madison, Wisconsin 53701-1497
Telephone: (608) 258-4263
Facsimile: (608) 258-4258

Callie M. Bell
Attorney for Applicants
Registration No. 54,989